PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Jupiter Aluminum Corporation Jupiter Coilcoating Division 205 East Carey Fairland, Indiana 46126

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| Operation Permit No.: T 145-12499-00013 | | | | |
|--|---------------------------------|--|--|--|
| Issued by: Janet G. McCabe, Assistant Commissioner Office of | Issuance Date: Expiration Date: | | | |

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Jupiter Aluminum Corporation, Jupiter Coilcoating Division Fairland, Indiana

Permit Reviewer: PMC/MES

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)

The Permittee owns and operates a stationary aluminum coil coating source.

Responsible Official: David Hudson

Source Address: 205 East Cary, Fairland, Indiana 46126 Mailing Address: 205 East Cary, Fairland, Indiana 46126

SIC Code: 3479 County Location: Shelby

Source Location Status: Attainment for all criteria pollutants

Attainment for all other criteria pollutants

Source Status: Part 70 Permit Program

Minor Source, under PSD Rules;

Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) aluminum roller coating line consisting of washing, treating, coating, baking, paint thinning, roller cleaning and quenching operations equipped with a direct flame incinerator (rated at 5.0 million British thermal units per hour), also equipped with a coil cleaning operation (uncontrolled), known as Line #1, installed in 1978, exhausted to stack S14, capacity: 10,200 linear feet per hour.
- (b) One (1) aluminum roller coating line consisting of washing, treating, coating, baking, , paint thinning, roller cleaning and quenching operations, known as Line #2, installed in 1999, equipped with a thermal oxidizer (rated at 16.0 million British thermal units per hour), also equipped with a coil cleaning operation (uncontrolled), exhausted to S15 S20, capacity: 21,000 linear feet per hour.
- (c) One (1) quality control testing operation, known as Test #1, installed in 1999, capacity: 0.15 gallons per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a

Permit Reviewer. PIVIC/IVIES

claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential

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to emit.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that

other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)] B.15

Deviations from any permit requirements (for emergencies see Section B - Emergency (a) Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- A deviation is an exceedance of a permit limitation or a failure to comply with a requirement (b) of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - Failure to implement elements of the Preventive Maintenance Plan unless such (2)failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

 If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if.

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)] If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
 The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
 The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) (b) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

Open Burning [326 IAC 4-1] [IC 13-17-9] C.3

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

Incineration [326 IAC 4-2] [326 IAC 9-1-2] C.4

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Notification requirements apply to each owner or operator. If the combined amount of requlated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirtyfive (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date:
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
 The Permittee shall comply with the applicable emission control procedures in 326 IAC 1410-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are
 applicable for any removal or disturbance of RACM greater than three (3) linear feet on
 pipes or three (3) square feet on any other facility components or a total of at least 0.75
 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management

Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)] C.11

In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this

permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certi-

fication statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] C.15

- The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - This condition; (1)
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - The Compliance Monitoring Requirements in Section D of this permit; (3)
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - A Compliance Response Plan (CRP) for each compliance monitoring condition of (5) this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- Upon investigation of a compliance monitoring excursion, the Permittee is excused from (c) taking further response steps for any of the following reasons:
 - A false reading occurs due to the malfunction of the monitoring equipment. This (1) shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

- (3) An automatic measurement was taken when the process was not operating.
- (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
 - (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

The annual emission statement required by this permit shall be considered timely if the date (c) postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- Records of all required data, reports and support information shall be retained for a period (a) of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- Unless otherwise specified in this permit, all record keeping requirements not already (b) legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- The report required in (a) of this condition and reports required by conditions in Section D (b) of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

The first report shall cover the period commencing on the date of issuance of this permit (e) and ending on the last day of the reporting period. Reporting periods are based on calendar vears.

Stratospheric Ozone Protection

Compliance with 40 CFR 82 and 326 IAC 22-1 C.20

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- Persons opening appliances for maintenance, service, repair, or disposal must comply with (a) the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- One (1) aluminum roller coating line consisting of washing, treating, coating, baking, paint (a) thinning, roller cleaning and quenching operations equipped with a direct flame incinerator (rated at 5.0 million British thermal units per hour), also equipped with a coil cleaning operation (uncontrolled), known as Line #1, installed in 1978, exhausted to stack S14, capacity: 10,200 linear feet per hour.
- (b) One (1) aluminum roller coating line consisting of washing, treating, coating, baking, , paint thinning, roller cleaning and quenching operations, known as Line #2, installed in 1999, equipped with a thermal oxidizer (rated at 16.0 million British thermal units per hour), also equipped with a coil cleaning operation (uncontrolled), exhausted to S15 - S20, capacity: 21,000 linear feet per hour.
- One (1) quality control testing operation, known as Test #1, installed in 1999, capacity: 0.15 (c) gallons per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compound [326 IAC 8-2-4]

- The direct flame incinerator of Line #1 and the thermal oxidizer of Line #2 shall be in operation at all times when Line #1 and/or Line #2 are in operation.
- (b) No owner or operator of Line #2 may cause, allow or permit the discharge into the atmosphere any volatile organic compounds (VOC) in excess of 2.6 pounds of VOCs per gallon of coating less water, delivered to the coating applicator from prime or single coat applications at Line #2.
- (c) When operating a thermal oxidizer to achieve the limit for 326 IAC 8-2-4 for Line #2 of 2.6 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum overall control efficiency of sixty two and eight tenths (62.8%) percent. This efficiency and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of sixty two and eight tenths (62.8%) percent, the VOC content of the coating shall not exceed nine and thirty-six hundredths (9.36) pounds per gallon of coating solids delivered to the applicator.

General Provisions Relating to NSPS [326 IAC 12-1-1] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1-1, apply to Line #2 except when otherwise specified in 40 CFR Part 60, Subpart TT.

Metal Coil Surface Coating NSPS [326 IAC 12-1-1] [40 CFR 60, Subpart TT]

Line #2 is subject to 40 CFR 63, Subpart TT, which is incorporated by reference in 326 IAC 12-1-1. A copy of the rule is attached.

The thermal oxidizer shall be used continuously, i.e., at all times that the facility is operated, (a) and operated at the most recently demonstrated overall efficiency.

- (b) The Permittee shall not cause to be discharged from the facility into the atmosphere more than:
 - (1) 0.14 kilogram VOC per liter (kg/l) of coating solids applied for each calendar month; or
 - (2) 10 percent of the VOC applied for each calendar month (90 percent emission reduction)

D.1.4 Compliance Assurance Monitoring [40 CFR Part 64]

The total input of VOC to the Line #2 thermal oxidizer, shall be limited such that the after control emissions are less than 100 tons per twelve (12) consecutive month period as calculated below. Therefore, the requirements of 40 CFR Part 64 are not applicable.

The controlled VOC emissions limit shall be calculated as follows:

VOC emissions = VOC input Line 2 X (1-VOC Line 2 control efficiency)

D.1.5 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total input of VOC to the Line #1 direct flame incinerator, combined with the VOC input to the Line #2 thermal oxidizer, shall be limited such that the after control emissions are no greater than 236 tons per twelve (12) consecutive months as calculated below. This limit, combined with the unlimited potential to emit VOC of 13.6 tons per year for the remaining facilities at this source and the coil cleaning operations at Line #1 and Line #2, will make the requirements of 326 IAC 2-2 not applicable.

The controlled VOC emissions limit shall be calculated as follows:

VOC emissions = VOC input Line 1 X (1-VOC Line 1 control efficiency) + VOC input Line 2 X (1-VOC Line 2 control efficiency)

D.1.6 New Source Toxics Control [326 IAC 2-4.1-1]

Line #2 is subject to 326 2-4.1-1. The requirement of this rule to install maximum achievable control technology is satisfied by Condition D.1.3 requiring use of a thermal oxidizer to comply with 40 CFR 60, Subpart TT.

D.1.7 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from each facility shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour; and $P =$ process weight rate in tons per hour

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B .13 - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 12, 40 CFR 60.463]

(a) Compliance stack tests for Line #1 shall be performed once every five years at the direct flame incinerator. These tests shall be performed according to methods acceptable be the

commissioner.

(b) The Permittee shall conduct a performance test for Line #2 for each calender month for each affected facility according to the following procedures specified in 40 CFR 60.463 Subpart TT.

The Permittee shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/l of coating solids applied.

- (1) Determine the overall reduction efficiency (R) for the capture system and control device, using procedures specified in 40 CFR 60.463(c)(2)(i).
- (2)Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating applied (G) during each calendar month for each affected facility using equations in 40 CFR 60.463(c)(1)(i)(A), (B), and (C).
- (3) Calculate the volume-weight average VOC emissions to the atmosphere (N) for each calendar month by the following equation:

$$N = G^*(1-R)$$

(4) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.10 Monitoring Requirements [326 IAC 12] [40 CFR 60.464]

For Line #1 the Permittee shall: (a)

> When operating, the direct flame incinerator shall maintain a minimum operating temperature of 1400 degrees Fahrenheit, or the temperature determined in the most recent compliance tests to maintain the minimum destruction efficiency of the VOC captured required to comply with the overall source limit of 250 tons per year. The temperature of the exhaust from the thermal oxidizer shall be recorded continuously whenever the facility is operating. In the event of malfunction of the temperature recorder, to the extent practicable, intermittent monitoring of the parameter shall be implemented at intervals no less than one hour until such time as the continuous monitor is back in operation.

- (b) For Line #2 the Permittee shall:
 - (1) Install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with Condition D.1.3. This device shall have an accuracy of ±2.5 degrees Celsius or ±0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater.
 - (2) Record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal oxidizer used to control emissions from an effected facility remains more than 28 degrees Celsius (50 degrees Fahrenheit) below the temperature at which compliance with 60.462(a)(2) or (3) was demonstrated during the most recent measurement of thermal oxidizer efficiency required by 40 CFR 60.8. The records required by 40 CFR 60.7 shall identify each such occurrence and its duration.

D.1.11 Visible Emissions Notations

- (a) Visible emission notations of the Line #1 and Line #2 stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Record Keeping [326 IAC 8-2-4] [326 IAC 12-1-1] [40 CFR 60, Subpart TT]

- (a) To document compliance with Condition D.1.1(b) and (c), the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1(b) and (c).
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.3, D1.4 and D.1.5, the Permittee shall maintain at the source, for a period of at least two years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. The Permittee shall maintain at the source daily records of the thermal oxidizer combustion temperature.
- (c) To document compliance with Condition D.1.11, the Permittee shall maintain records of visible emission notations of Line #1 and Line #2 stack exhaust once per shift.
- (d) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

D.1.13 Reporting [326 IAC 12, 40 CFR 60.465] [326 IAC 2-2]

- (a) For Line #2 the Permittee shall identify, record, and submit a written report to IDEM, OAQ every calendar quarter of each instance in which the volume- weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under Condition D.1.3. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to IDEM, OAQ semi-annually.
- (b) For Line #2 the Permittee shall also submit reports at the frequency specified in 40 CFR 60.7(c) when the thermal oxidizer temperature drops as defined by Condition D.1.10(b). If no such periods occur, the Permittee shall state that in the report.
- (c) A quarterly summary of the information to document compliance with Conditions D.1.4 and D.1.5 shall be submitted to the addresses listed in Section C General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (d) The reports submitted by the Permittee do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY AIR COMPLIANCE BRANCH

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Jupiter Aluminum Corporation, Jupiter Coilcoating Division

Source Address: 205 East Cary Street, Fairland, Indiana 46126 Mailing Address: 205 East Cary Street, Fairland, Indiana 46126

Part 70 Permit No.: T 145-12499-00013

| | | Ill be included when submitting monitoring, testing reports/results or other documents as required by this permit. | | |
|---|--|--|--|--|
| | Please check what document is being certified: | | | |
| 9 | 9 Annual Compliance Certification Letter | | | |
| 9 | Test Result (specify) | | | |
| 9 | Report (specify) | | | |
| 9 | Notification (specify) | | | |
| 9 | Affidavit (specify) | | | |
| 9 | Other (specify) | | | |
| | | | | |
| I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. | | | | |
| Sig | nature: | | | |
| Prir | nted Name: | | | |
| Title | e/Position: | | | |
| Dat | e: | | | |

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OFAIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT EMERGENCY OCCURRENCE REPORT

Source Name: Jupiter Aluminum Corporation, Jupiter Coilcoating Division

Source Address: 205 East Cary Street, Fairland, Indiana 46126 Mailing Address: 205 East Cary Street, Fairland, Indiana 46126

Part 70 Permit No.: T 145-12499-00013

This form consists of 2 pages

Page 1 of 2

| 9 | This is an emergency as defined in 326 IAC 2-7-1(| 12 |
|---|---|----|
| , | This is all chicigonaly as achined in 620 in 627 if | |

- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

| Facility/Equipment/Operation: | | | |
|---|--|--|--|
| | | | |
| | | | |
| Control Equipment: | | | |
| | | | |
| Permit Condition or Operation Limitation in Permit: | | | |
| | | | |
| Description of the Emergency: | | | |
| | | | |
| Describe the cause of the Emergency: | | | |
| | | | |
| | | | |

Phone:

| f any of the following are not applicable, mark N/A | Page 2 of 2 |
|---|-------------|
| Date/Time Emergency started: | |
| Date/Time Emergency was corrected: | |
| Was the facility being properly operated at the time of the emergency? Y Describe: | N |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: | |
| Estimated amount of pollutant(s) emitted during emergency: | |
| Describe the steps taken to mitigate the problem: | |
| Describe the corrective actions/response steps taken: | |
| Describe the measures taken to minimize emissions: | |
| If applicable, describe the reasons why continued operation of the facilities are not imminent injury to persons, severe damage to equipment, substantial loss of cap loss of product or raw materials of substantial economic value: | |
| Form Completed by: | |
| Title / Position: | |
| Date: | |

A certification is not required for this report.

Jupiter Aluminum Corporation, Jupiter Coilcoating Division Fairland, Indiana

Phone:

Permit Reviewer: PMC/MES

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OFAIR QUALITY COMPLIANCE DATA SECTION

| | Part | 70 Quarterly Report | | |
|---|--|-------------------------|---------------------|--|
| Source Name: Source Address: Mailing Address: Part 70 Permit No.: Facility: Parameter: Limit: | Jupiter Aluminum Corporation, Jupiter Coilcoating Division 205 East Cary Street, Fairland, Indiana 46126 205 East Cary Street, Fairland, Indiana 46126 T 145-12499-00013 Line #2 VOC Controlled VOC emissions less than 100 tons per twelve (12) consecutive month period based on the following equation: | | | |
| | VOC emissions = VOC input Line 2 X (1-VOC Line 2 control efficiency) | | | |
| | YEAI | R: | | |
| | VOC Emissions | VOC Emissions | VOC Emissions | |
| Month | Tons This Month | Tons Previous 11 Months | Tons 12 Month Total | |
| | | | | |
| | | | | |
| 9 | | | | |
| Sub | Submitted by: | | | |
| Title | /Position: | | | |
| Sign | Signature: | | | |
| Date | e: | | | |

Attach a signed certification to complete this report.

Submitted by: Title/Position: Signature:

Date: Phone: Page 34 of 37 T 145-12499-00013

Permit Reviewer: PMC/MES

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OFAIR QUALITY COMPLIANCE DATA SECTION

Part 70 Quarterly Report

| Fait 10 Quarterly Report | | | |
|--|---|-------------------------|---------------------|
| Source Name: Source Address: Mailing Address: Part 70 Permit No.: Facility: Parameter: Limit: | Jupiter Aluminum Corporation, Jupiter Coilcoating Division 205 East Cary Street, Fairland, Indiana 46126 205 East Cary Street, Fairland, Indiana 46126 T 145-12499-00013 Line #1 and Line #2 VOC Controlled VOC emissions no greater than 236 tons per twelve (12) consecutive months based on the following equation: VOC emissions = VOC input Line 1 X (1-VOC Line 1 control efficiency) + VOC input Line 2 X (1-VOC Line 2 control efficiency) | | |
| | VOC Frainciana | VOC Emissions | VOC Francisco |
| Month | VOC Emissions | VOC Emissions | VOC Emssions |
| WOTH | Tons This Month | Tons Previous 11 Months | Tons 12 Month Total |
| | | | |
| No deviation occurred in this month. Deviation/s occurred in this month. Deviation has been reported on: | | | |

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT **OFFICE OFAIR QUALITY COMPLIANCE DATA SECTION**

Part 70 Quarterly/Semi-annual Report

| Source Name: Source Address: Mailing Address: Part 70 Permit No.: Facility: | Jupiter Aluminum Corpo 205 East Cary Street, F 205 East Cary Street, F T 145-12499-00013 Line #2 | airland, Indiana | a 46126 |
|---|--|--------------------------------------|--|
| | Months: | to | Year: |
| Check the applicable b | oox: | | |
| and describes each ins the atmosphere per vo | stance in which the volum | ne-weighted ave solids (N) is gre | rt is being submitted for a calendar quarter erage of the local mass of VOC emitted to ater than the limit of 90% VOC emission |
| | | | t is being submitted and describes when D.1.9 of T 145-12499-00013. |
| 9 Pur been no instances as t | | this report is be | eing submitted semi-annually. There have |
| Description of each in | nstance defined above: | | |
| | | | |
| | | | |
| | | | |
| | | | |
| (attach additional pag | ges as needed) | | |
| | Form Completed By | | |
| | Title/Position: | | |
| | Date: | | |
| | Phone: | | |

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OFAIR QUALITY AIR COMPLIANCE BRANCH

PART 70 OPERATING PERMIT QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Jupiter Aluminum Corporation, Jupiter Coilcoating Division Source Address: 205 East Cary Street, Fairland, Indiana 46126 205 East Cary Street, Fairland, Indiana 46126 Mailing Address: Part 70 Permit No.: T 145-12499-00013 Months: _____ to ____ Year: ____ Page 1 of 2 This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period". 9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. 9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD **Permit Requirement** (specify permit condition #) **Duration of Deviation: Date of Deviation: Number of Deviations: Probable Cause of Deviation:** Response Steps Taken: Permit Requirement (specify permit condition #) **Duration of Deviation: Date of Deviation: Number of Deviations: Probable Cause of Deviation:** Response Steps Taken:

Page 2 of 2

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|---------------------|---------|----------------|-----------|-------------------------------|---------|
| Permit Requirement | (specif | y permit condi | tion #) | | |
| Date of Deviation: | | | | Duration of Deviation: | |
| Number of Deviation | ıs: | | | | |
| Probable Cause of D | eviatio | n: | | | |
| Response Steps Tak | cen: | | | | |
| Permit Requirement | (specif | y permit condi | tion #) | | |
| Date of Deviation: | | | | Duration of Deviation: | |
| Number of Deviation | ns: | | | | |
| Probable Cause of D | eviatio | n: | | | |
| Response Steps Tak | ken: | | | | |
| Permit Requirement | (specif | y permit condi | tion #) | | |
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| Number of Deviation | ıs: | | | | |
| Probable Cause of D | eviatio | n: | | | |
| Response Steps Tak | cen: | | | | |
| | 9 | No deviation | occurre | ed in this month. | |
| | 9 | Deviation/s | occurred | I in this month. | |
| | | Deviation ha | as been i | reported on: | |
| | Submi | tted by: | | • | |
| | Title/P | osition: | | | |
| | Signat | ure: | | | |
| | Date: | | | | |
| | Phone | : : | | | |

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Jupiter Aluminum Corporation, Jupiter Coilcoating Division

Source Location: 205 East Cary Street, Fairland, Indiana 46126

County: Shelby SIC Code: 3479

Operation Permit No.: T 145-12499-00013
Permit Reviewer: Paula M Cognitore

The Office of Air Management (OAM) has reviewed a Part 70 Operating Permit application from Jupiter Aluminum Corporation, Jupiter Coilcoating Division relating to the operation of an aluminum coil coating source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) aluminum roller coating line consisting of washing, treating, coating, baking, paint thinning, roller cleaning and quenching operations equipped with a direct flame incinerator (rated at 5.0 million British thermal units per hour), also equipped with a coil cleaning operation (uncontrolled), known as Line #1, installed in 1978, exhausted to stack S14, capacity: 10,200 linear feet per hour.
- (b) One (1) aluminum roller coating line consisting of washing, treating, coating, baking, , paint thinning, roller cleaning and quenching operations, known as Line #2, installed in 1999, equipped with a thermal oxidizer (rated at 16.0 million British thermal units per hour), also equipped with a coil cleaning operation (uncontrolled), exhausted to S15 S20, capacity: 21,000 linear feet per hour.
- (c) One (1) quality control testing operation, known as Test #1, installed in 1999, capacity: 0.15 gallons per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.
- (b) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (c) Infrared cure equipment.
- (d) Paved and unpaved roads and parking lots with public access.
- (e) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) F 145-5537-00038 issued on December 10, 1996,
- (b) AAF 145-8308 issued on April 17, 1997,
- (c) AAF 145-8472 issued on April 29, 1997.
- (d) AAF 145-9192-00013 on December 17, 1997,
- (e) Permit Revision 145-10579-00013, issued on January 24, 2000.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(a) F 145-5537-00038 issued on December 10, 1996

Condition C.1 Overall Source Limit (326 IAC 2-8)

Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the equipment listed in Section D.1 entire source shall not exceed 99 tons per 365 day period. Emissions of hazardous air pollutants (HAPs) from the equipment listed in Section D.1 entire source shall not exceed 9 tons of any individual HAP per 365 day period or 24 tons of any combination of HAPs per 365 day period. Emissions shall include those from all equipment listed in Section D.1 emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(21)(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail.

Reason not incorporated: Pursuant to Permit Revision 145-10579-00013, issued on January 24, 2000, the source is subject to the requirements of 326 IAC 2-7. Therefore emission limitations to meet 326 IAC 2-8 are not required.

Jupiter Aluminum Corporation , Jupiter Coilcoating Division

Fairland, Indiana

Permit Reviewer: PMC/MES

Page 3 of 11 T 145-12499-00013

(b) F 145-5537-00038 issued on December 10, 1996

Condition D.1.1 (b) and (c)

The volatile organic compound (VOC) emissions after control from the roller coating line shall not exceed 8.32 tons per month. Therefore, the requirements of 326 IAC 2-7 do not apply.

The amount of VOCs delivered to the applicators, including cleanup solvents, shall not exceed 40.025 tons per month.

Reason not incorporated: Same as above.

(c) F 145-5537-00038 issued on December 10, 1996

Condition D.1.2 (b), (c), (d) and (e)

The hazardous air pollutant emissions shall be limited as follows:

A single hazardous air pollutant (HAP) emissions shall not exceed 0.825 tons per month.

The amount of any given single HAP delivered to the applicators, including cleanup solvents, shall not exceed 3.97 tons per month.

Any combination of HAPs emissions shall not exceed 2.075 tons per month.

The total amount of HAPs delivered to the applicators, including cleanup solvents, shall not exceed 9.975 tons per month.

Therefore, the requirements of 326 IAC 2-7 do not apply.

Reason not incorporated: Same as above.

(d) Permit Revision 145-10579-00013, issued on January 24, 2000

Condition D.2.4

The thermal incinerator shall operate at all times that the aluminum coil coating line is operated. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400 degrees Fahrenheit or a temperature, fan amperage and duct velocity determined during compliance tests to maintain a minimum 90 percent destruction of the volatile organic compound (VOC) captured. The input of VOC to the thermal incinerator shall not exceed 2,430 tons per twelve (12) consecutive months when operating at 90 percent control efficiency, equivalent to less than 250 tons of VOC per year, in order to make the requirements of 326 IAC 2-2 not applicable. Therefore, this will be a minor source pursuant to 326 IAC 2-2.

Any change or modification to these facilities, such as increasing VOC usage at the facilities controlled by the thermal oxidizer to 2,430 tons per twelve (12) consecutive months when operating at 90 percent control efficiency, which may increase the potential to emit, as defined by 326 IAC 2-1.1-1(16), from the total of one (1) aluminum coating line, one (1) coil cleaning operation and one (1) quality control testing operation to 250 tons per year or more of VOC shall cause the facilities to be a major modification to an existing minor source pursuant to 326 IAC 2-2, and shall require prior IDEM, OAM, approval.

Reason not incorporated: The PSD limit that insured that the Line 2 modification was a minor PSD modification has been replaced by a source-wide limit to insure that the entire source maintains its minor PSD status.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on July 19, 2000. Additional information was received on August 31, 2000.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 4 of 4 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) |
|------------------|----------------------------------|
| PM | 0.237 |
| PM ₁₀ | 0.237 |
| SO ₂ | 0.047 |
| VOC | 3685 |
| СО | 1.58 |
| NO_{χ} | 11.04 |

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

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| HAPs | Potential To Emit (tons/year) |
|--------------------|----------------------------------|
| Xylene | 1227 |
| Formaldehyde | 2.71 |
| Nickel Compounds | 246 |
| Chromium Compounds | 272 |
| Glycol Ethers | 963 |
| Naphthalene | 175 |
| Ethyl benzene | 272 |
| MEK | 4.29 |
| 2-butoxylethanol | 84.6 |
| Toluene | 14.9 |
| TOTAL | 3262 |

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or (b) greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

| | | | Limite | d Potential t (tons/year) | to Emit | | | | | | | | | |
|-----------------------------|-------|---|--------|------------------------------|---------|------|------|--|--|--|--|--|--|--|
| Process/facility | PM | PM PM ₁₀ SO ₂ VOC CO NO _X HAPs | | | | | | | | | | | | |
| Line #1 | 0.00 | 0.00 | 0.00 | 41.7 | 0.00 | 0.00 | 38.1 | | | | | | | |
| Line #2 | 0.237 | 0.237 | 0.047 | 70.4 | 1.58 | 11.0 | 62.7 | | | | | | | |
| Test #1 | 0.00 | 0.00 | 0.00 | 4.29 | 0.00 | 0.00 | 4.29 | | | | | | | |
| Insignificant Activities | 5.00 | 5.00 | 1.0 | 7.0 | 5.0 | 5.0 | 1.0 | | | | | | | |

| | | Limited Potential to Emit (tons/year) | | | | | | | | | | | | | |
|------------------|------|---------------------------------------|-----------------|-----|------|-----------------|------|--|--|--|--|--|--|--|--|
| Process/facility | PM | PM ₁₀ | SO ₂ | voc | со | NO _x | HAPs | | | | | | | | |
| Total Emissions | 5.24 | 5.24 | 1.05 | 123 | 6.58 | 16.0 | 106 | | | | | | | | |

Note: Total VOC emissions from the entire source shall be limited to less than 250 tons per year as detailed under the PSD (326 IAC 2-2) discussion. Line #2 shall be limited to less than 100 tons per year as detailed under Federal Rule Applicability. The potential to emit VOC in the above table reflect the after control potential with the stated control efficiencies for the control devices for Lines #1 and #2.

County Attainment Status

The source is located in Shelby County.

| Pollutant | Status |
|------------------|------------|
| PM ₁₀ | attainment |
| SO ₂ | attainment |
| NO ₂ | attainment |
| Ozone | attainment |
| СО | attainment |
| Lead | attainment |

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO $_{\rm X}$) are precursors for the formation of ozone. Therefore, VOC and NO $_{\rm X}$ emissions are considered when evaluating the rule applicability relating to the ozone standards. Shelby County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO $_{\rm X}$ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Shelby County has been classified as attainment or unclassifiable for all remaining pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2
 and since there are no applicable New Source Performance Standards that were in effect
 on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and
 Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70

permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This Part 70 does not involve a pollutant-specific emissions unit with the potential to emit after control in an amount equal to or greater than one hundred (100) tons per year since Line #1 does not have any applicable 326 IAC 8 requirements and Line #2 has accepted a less than 100 tons per (12) twelve consecutive month period VOC limit. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.
- (b) Line #2 is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.460, Subpart TT (Standards of Performance for Metal Coil Surface Coating). This rule requires that each owner and operator subject to this subpart shall not cause to be discharged into the atmosphere more than 0.14 kilogram VOC per liter (kg/l) of coating solids applied for each calendar month or 10 percent of the VOC's applied for each calender month (90 percent emission reduction) for each affected facility that continuously uses an emission control device operated at the most recently demonstrated overall efficiency. Line #1 is not subject to the requirements of this rule because it was constructed before the 1981 applicability date.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on August 31, 2000. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The total input of VOC to the Line #1 direct flame incinerator, combined with the VOC input to the Line #2 thermal oxidizer, shall be limited such that the after control emissions are no greater than 236 tons per twelve (12) consecutive months as calculated below. This limit, combined with the unlimited potential to emit VOC of 13.6 tons per year for the remaining facilities at this source and the coil cleaning operations at Line #1 and Line #2, will make the requirements of 326 IAC 2-2 not applicable. Therefore, this will be a minor source pursuant to 326 IAC 2-2.

The controlled VOC emissions shall limit will be calculated as follows:

VOC emissions = VOC input Line 1 X (1-VOC Line 1 control efficiency) + VOC input Line 2 X (1-VOC Line 2 control efficiency)

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year) of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC

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2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (New Source Toxics Control)

Line #2 has the potential to emit more than 10 tons per year of a single HAP and 25 tons per year of any combination of HAPs; therefore, 326 IAC 2-4.1 is applicable. The requirement of this rule to install maximum achievable control technology is satisfied by the metal coil surface coating NSPS which requires the use of a thermal oxidizer to comply with 40 CFR 60 Subpart TT.

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from Line #1, Line #1 and Test #1 shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour and $P =$ process weight rate in tons per hour.

Since the aluminum coil coating line uses rollers to apply the coatings, the transfer efficiency is 100%; therefore, the PM potential from this process is negligible and the aluminum coil coating line will comply with this rule.

326 IAC 8-2-4 (Coil coating operations)

- (a) Line #1 is not subject to this rule since the line was constructed prior to January 1, 1980.
- (b) Pursuant to 326 IAC 8-2-4 (Coil Coating Operations), no owner or operator of Line #2 may cause, allow or permit the discharge into the atmosphere any volatile organic compounds (VOC) in excess of 2.6 pounds of VOCs per gallon of coating less water, delivered to the coating applicator from prime or single coat applications at Line #2.

Based on the MSDS submitted by the source and calculations made, with the operation of the thermal oxidizer at all times the aluminum coil coating line is in operation, the VOC emitted from all coatings used in the aluminum coil coating line will be less than 2.6 pounds per gallon less water; therefore, meeting the requirements of 326 IAC 8-2-4 (see calculation

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below):

The minimum overall control efficiency of the oxidizer has been calculated as follows as described in 326 IAC 8-1-2(c).

E = L/[1-(L/D)], where E = emission limit in pounds per gallon of solids

L = 2.6 pounds of VOC per gallon less water

D = density of VOC in coating, 10.25 pounds per gallon

A solvent density of ten and twenty-five hundredth (10.25) pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

E = 2.6/[1-(2.6/10.25)] = 3.48 pounds per gallon of solid

 $O = [(V-E)/V] \times 100$, where O = overall control efficiency required for compliance in percent

E = 3.48 pounds per gallons of solids

V = VOC content of organic coating in pounds per gallon solids

solids as-applied (9.36 pounds VOC per gallon of solids as shown on page 1 of 3 of Appendix A)

 $O = [(9.36 - 3.48)/9.36] \times 100 = 62.8\%$

Since the overall control efficiency for the thermal oxidizer is 97.02%, this unit complies with the rule.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) Line #1 is not subject to the requirements of 326 IAC 8-2-9 because as stated in 326 IAC 8-2-9(b)(1), this rule does not apply because this line was constructed propr to January 1, 1980.
- (b) Line #2 is not subject to the requirements of 326 IAC 8-2-9 because as stated in 326 IAC 8-2-9(b)(1), this rule does not apply to, "Any metal parts or products limited by other sections of this rule." Since the requirements of 326 IAC 8-2-4 are applicable to Line #2, the requirements of 326 IAC 8-2-9 are not applicable.

Testing Requirements

- (a) Compliance stack tests for Line #1 shall be performed once every five years at the direct flame incinerator. These tests shall be performed according to methods acceptable be the commissioner.
- (b) The Permittee shall conduct a performance test for Line #2 for each calender month for each affected facility according to the following procedures specified in 40 CFR 60.463 Subpart TT.

The Permittee shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/l of coating solids applied.

(1) Determine the overall reduction efficiency (R) for the capture system and control

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device, using procedures specified in 40 CFR 60.463(c)(2)(i).

- (2) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating applied (G) during each calendar month for each affected facility using equations in 40 CFR 60.463(c)(1)(i)(A), (B), and (C).
- (3) Calculate the volume-weight average VOC emissions to the atmosphere (N) for each calendar month by the following equation:

$$N = G^*(1-R)$$

(4) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) Line #1 has applicable compliance monitoring conditions as specified below:
 - (1) When operating, the direct flame incinerator shall maintain a minimum operating temperature of 1400 degrees Fahrenheit, or the temperature determined in the most recent compliance tests to maintain the minimum destruction efficiency of the VOC captured required to comply with the overall source limit of 250 tons per year. The temperature of the exhaust from the thermal oxidizer shall be recorded continuously whenever the facility is operating. In the event of malfunction of the temperature recorder, to the extent practicable, intermittent monitoring of the parameter shall be implemented at intervals no less than one hour until such time as the continuous monitor is back in operation.
 - (2) Visible emissions notations of the Line #1 shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of

batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because direct flame incinerator must operate properly to ensure compliance with 326 IAC 2-7 (Part 70).

- (b) Line #2 has applicable compliance monitoring conditions as specified below:
 - (1) Install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with the metal coil surface coating NSPS. This device shall have an accuracy of ±2.5 degrees Celsius or ±0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater.
 - (2) Record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal oxidizer used to control emissions from an effected facility remains more than 28 degrees Celsius (50 degrees Fahrenheit) below the temperature at which compliance with 60.462(a)(2) or (3) was demonstrated during the most recent measurement of thermal oxidizer efficiency required by 40 CFR 60.8. The records required by 40 CFR 60.7 shall identify each such occurrence and its duration.
 - (3) Visible emissions notations of the Line #2 shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because direct flame incinerator must operate properly to ensure compliance with 326 IAC 8-2-4, 326 IAC 2-7 (Part 70) and 40 CFR 60, Subpart TT.

Conclusion

The operation of this aluminum coil coating operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 145-12499-00013.**s

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Jupiter Aluminum Corporation, Jupiter Coilcoating Division

Source Location: 205 East Cary Street, Fairland, Indiana 46126

County: Shelby SIC Code: 3479

Operation Permit No.: T 145-12499-00013
Permit Reviewer: Paula M. Cognitore

On December 30, 2000, the Office of Air Quality (OAQ) had a notice published in The Shelbyville News Shelbyville, Indiana, stating that Jupiter Aluminum Corporation, Jupiter Coilcoating Division had applied for a Part 70 Operating Permit to operate a an aluminum coil coating source with a direct flame incinerator and thermal oxidizer as control. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following change to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as strikeouts, new language is **bolded**):

The name of IDEM's "Office of Air Management" was changed to "Office of Air Quality" on January 1, 2001. All references to "Office of Air Management" in the permit have been changed to "Office of Air Quality" and all references to "OAM" have been changed to "OAQ."

Appendix A: Potential Emissions Calculations **VOC and Particulate** From Surface Coating Operations LINE 1

Company Name: Jupiter Aluminum Corporation, Jupiter Coilcoating Division

Address City IN Zip: 205 East Cary Street, Fairland, Indiana 46126

Part 70: 145-12499 PIt ID: 145-00013 Reviewer: Paula M. Cognitore

Date: July 19, 2000

| Material | Density | Weight % | Weight % | Weight % | Volume % | Volume % | Gal of Mat | Maximum* | Pounds VOC | Pounds VOC | Potential | Potential | Potential | Particulate | lb VOC | Transfer |
|--------------------------------|----------|-----------|----------|----------|----------|----------|------------|-------------|------------|------------|------------|------------|-----------|---------------|--------|------------|
| | (lb/gal) | Volatile | Water | Organics | Water | Non-Vol | (gal/unit) | (unit/hour) | per gallon | per gallon | VOC pounds | VOC pounds | VOC tons | Potential | /gal | Efficiency |
| | | (H20 & | | | | (solids) | | | of coating | of coating | per hour | per day | per year | tons per year | solids | |
| | | Organics) | | | | | | | less water | _ | | | | | | |
| Coil Coating, Baking and | | | | | | | | | | | | | | | | |
| Quenching Operations | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |
| Line 1 | | | | | | | | | | | | | | | | |
| Green Backer 2578G20003 | 10.25 | 40.16% | 0.0% | 40.2% | 0.0% | 44.00% | 1.00 | 75.00 | 4.12 | 4.12 | 308.73 | 7409.52 | 1352.24 | 0.00 | 9.36 | 100% |
| West Coast Sandstone 256D30028 | 10.26 | 37.30% | 0.0% | 37.3% | 0.0% | 47.00% | 1.00 | 75.00 | 3.83 | 3.83 | 287.02 | 6888.56 | 1257.16 | 0.00 | 8.14 | 100% |
| West Coast Tan 2568D60013 | 10.61 | 35.18% | 0.0% | 35.2% | 0.0% | 49.00% | 1.00 | 75.00 | 3.73 | 3.73 | 279.94 | 6718.68 | 1226.16 | 0.00 | 7.62 | 100% |
| R-547 Brass 2563T80021 | 8.60 | 40.86% | 0.0% | 40.9% | 0.0% | 50.00% | 1.00 | 75.00 | 3.51 | 3.51 | 263.55 | 6325.13 | 1154.34 | 0.00 | 7.03 | 100% |
| Fabwel Birch White 2569W10032 | 11.70 | 31.39% | 0.0% | 31.4% | 0.0% | 50.00% | 1.00 | 75.00 | 3.67 | 3.67 | 275.45 | 6610.73 | 1206.46 | 0.00 | 7.35 | 100% |
| | | | | | | | | | | | | | | | | |
| TOTAL | | | | | | | | | | | 309 | 7410 | 1352 | 0.00 | | |

| Material | Density | 1998 | Potential | Potential | Potential |
|---------------------------|----------|----------|------------|-----------|-----------|
| | (lb/gal) | Usage | VOC pounds | VOC tons | VOC tons |
| | | (gal/yr) | per hour | per day | per year |
| Paint Thinning Operation | | | | | |
| Line 1 2 - butoxyethanol | 7.50 | 4200.00 | 3.60 | 0.04 | 15.75 |
| | | | | | |
| Roller Cleaning Operation | | | | | |
| Line 1 toluene | 7.25 | 4121.00 | 3.41 | 0.04 | 14.94 |
| TOTAL | | | 7.01 | 0.08 | 30.69 |

State Potential Emissions Add worst case coating to all solvents

| Otate i Otentiai Emissions | | | Add Worst Cas | se coating to a | ii adiverita | | | | | | | | | | |
|-------------------------------------|-----------------|----------|---------------|-----------------|--------------|---------------|---------|---------|-------------------|---------|------------|------------|------------|-------------|---------|
| Control Technology Emissions (Com | bustion) | | | | | | | | | | | | | | |
| | | | | | | Emission Fact | ors | | | | | Emissions | | | |
| Туре | Number | Capacity | Gas usage | PM | PM10 | SO2 | NOx | VOC | CO | PM | PM10 | SO2 | NOx | VOC | CO |
| | | MMBtu/hr | MMCF/yr | lb/MMCF | lb/MMCF | lb/MMCF | lb/MMCF | lb/MMCF | lb/MMCF | tons/yr | tons/yr | tons/yr | tons/yr | tons/yr | tons/yr |
| Catalytic | | | 0.0 | 3.0 | 3.0 | 0.6 | 100.0 | 5.3 | 35.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| | | | | | | | | | | | | | | | |
| Thermal | 1 | 0 | 0.0 | 3.0 | 3.0 | 0.6 | 140.0 | 2.8 | 20.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| | | | | | | | | | | | | | | | |
| Total | | | 0.0 | | | | | | | 0.000 | 0.000 | 0.000 | 0.00 | 0.000 | 0.00 |
| | | | | | | | | | | | | | | | |
| The combustion is considered insign | ificant (5.0 MN | (Btu) | | | | | | | Control Efficienc | y | Controlled | Controlled | Controlled | Controlled | |
| | | | | | | | | | VOC | PM | VOC pounds | VOC pounds | VOC | Particulate | |
| | | | | | | | | | 0.9702 | | per hour | per day | tons/yr | tons/yr | |

9.41

221

41.2

0.000

Controlled Emissions due to Surface Coating Operations and Controls

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Potential Emissions Calculations VOC and Particulate From Surface Coating Operations LINE 2

Company Name: Jupiter Aluminum Corporation, Jupiter Coilcoating Division

Address City IN Zip: 205 East Cary Street, Fairland, Indiana 46126

Part 70: 145-12499
Plt ID: 145-00013
Reviewer: Paula M. Cognitore
Date: July 19, 2000

| Material | Density | Weight % | Weight % | Weight % | Volume % | Volume % | Gal of Mat | Maximum* | Pounds VOC | Pounds VOC | Potential | Potential | Potential | Particulate | lb VOC | Transfer |
|--------------------------------|----------|-----------|----------|----------|----------|----------|------------|-------------|------------|------------|------------|------------|-----------|---------------|--------|------------|
| | (lb/gal) | Volatile | Water | Organics | Water | Non-Vol | (gal/unit) | (unit/hour) | per gallon | per gallon | VOC pounds | VOC pounds | VOC tons | Potential | /gal | Efficiency |
| | | (H20 & | | | | (solids) | | | of coating | of coating | per hour | per day | per year | tons per year | solids | |
| | | Organics) | | | | | | | less water | | | | | | | |
| Coil Coating, Baking and | | | | | | | | | | | | | | | | |
| Quenching Operations | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |
| Line 2 | | | | | | | | | | | | | | | | |
| Green Backer 2578G20003 | 10.25 | 40.16% | 0.0% | 40.2% | 0.0% | 44.00% | 1.00 | 120.00 | 4.12 | 4.12 | 493.97 | 11855.23 | 2163.58 | 0.00 | 9.36 | 100% |
| West Coast Sandstone 256D30028 | 10.26 | 37.30% | 0.0% | 37.3% | 0.0% | 47.00% | 1.00 | 120.00 | 3.83 | 3.83 | 459.24 | 11021.70 | 2011.46 | 0.00 | 8.14 | 100% |
| West Coast Tan 2568D60013 | 10.61 | 35.18% | 0.0% | 35.2% | 0.0% | 49.00% | 1.00 | 120.00 | 3.73 | 3.73 | 447.91 | 10749.88 | 1961.85 | 0.00 | 7.62 | 100% |
| R-547 Brass 2563T80021 | 8.60 | 40.86% | 0.0% | 40.9% | 0.0% | 50.00% | 1.00 | 120.00 | 3.51 | 3.51 | 421.68 | 10120.20 | 1846.94 | 0.00 | 7.03 | 100% |
| Fabwel Birch White 2569W10032 | 11.70 | 31.39% | 0.0% | 31.4% | 0.0% | 50.00% | 1.00 | 120.00 | 3.67 | 3.67 | 440.72 | 10577.17 | 1930.33 | 0.00 | 7.35 | 100% |
| | | | | | | | | | | | | | | | | |
| TOTAL | | | | | | | | | | | 494 | 11855 | 2164 | 0.00 | | |

| Material | Density | 1998 | Scaling | Potential | Potential | Potential |
|---------------------------|----------|----------|----------|------------|-----------|-----------|
| | (lb/gal) | Usage | Factor** | VOC pounds | VOC tons | VOC tons |
| | | (gal/yr) | | per hour | per day | per year |
| | | "" | | · | . , | ' ' |
| Paint Thinning Operation | | | | | | |
| Line 2 2 - butoxyethanol | 7.50 | 4200.00 | 4.26 | 15.32 | 0.18 | 67.10 |
| | | | | | | |
| Roller Cleaning Operation | | | | | | |
| Line 2 toluene | 7.25 | 4121.00 | 4.26 | 14.53 | 0.17 | 63.64 |
| TOTAL | | | | 29.8 | 0.358 | 131 |

State Potential Emissions Add worst case coating to all solvents

| Control Technology Emissions (Com | bustion) | | | | | | | | | | | | | | |
|-----------------------------------|----------|----------|-----------|---------|---------|---------------|---------|---------|-------------------|---------|------------|------------|------------|-------------|---------|
| | | | | | | Emission Fact | ors | | | | | Emissions | | | |
| Type | Number | Capacity | Gas usage | PM | PM10 | SO2 | NOx | VOC | CO | PM | PM10 | SO2 | NOx | VOC | CO |
| | | MMBtu/hr | MMCF/yr | lb/MMCF | lb/MMCF | lb/MMCF | lb/MMCF | lb/MMCF | lb/MMCF | tons/yr | tons/yr | tons/yr | tons/yr | tons/yr | tons/yr |
| Catalytic | | | 0.0 | 3.0 | 3.0 | 0.6 | 100.0 | 5.3 | 35.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| | | | | | | | | | | | | | | | |
| Thermal | 1 | 18 | 157.7 | 3.0 | 3.0 | 0.6 | 140.0 | 2.8 | 20.0 | 0.2 | 0.2 | 0.0 | 11.0 | 0.2 | 1.6 |
| | | | | | | | | | | | | | | | |
| Total | | | 157.7 | | | | | | | 0.237 | 0.237 | 0.047 | 11.04 | 0.221 | 1.58 |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | Control Efficienc | у | Controlled | Controlled | Controlled | Controlled | |
| | | | | | | | | | VOC | PM | VOC pounds | VOC pounds | VOC | Particulate | |
| | | | | | | | | | 0.9702 | | per hour | per day | tons/yr | tons/yr | |

15.7

0.237

Controlled Emissions due to Surface Coating Operations and Controls

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

^{**}Scaling Factor= The new line is has a capacity 3.25 times greater than the old line. The ratio of 1998 potential hours to actual hours is 1.31. Therefore, a scaling factor of 4.26 (3.25*1.31) was used to calculate the PTE.

All HAP Emission Calculations Page 3 of 4 TSD AppA

Company Name: Jupiter Aluminum Corporation, Jupiter Coilcoating Division Plant Location: 205 East Cary Street, Fairland, Indiana 46126

County: Shelby
Permit Reviewer: Paula M. Cognitore
Date: July 19, 2000

| Material | Density (lb/gal) | Gal of Mat (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Formaldehyde | Weight % Nickel Compounds | Weight % Chromium Compound | Weight % Glycol Ethers | Weight % Naphthalene | Weight % Ethyl- benzene | Xylene Emissions (tons/yr) | Formaldehyde Emissions (tons/yr) | Nickel Compounds Emissions (tons/yr) | Chromium Compound Emissions (tons/yr) | Glycol Ethers Emissions (tons/yr) | Naphthalene Emissions (tons/yr) | Ethyl- benzene (tons/yr) |
|--------------------------------|---------------------|--------------------------|------------------------|--------------------|--------------------------|---------------------------------|----------------------------------|---------------------------|-------------------------|-------------------------------|----------------------------------|--|---|--|---|---------------------------------------|--------------------------------|
| Coil Coating, Baking and | | | | | | | | | | | | | | | | | |
| Quenching Operations | | | | | | | | | | | | | | | | | |
| LINE 1 and LINE 2 | | | | | | | | | | | | | | | | | |
| Green Backer 2578G20003 | 10.25 | 1.00 | 195.00 | 7.00% | 0.03% | 2.82% | 0.00% | 11.00% | 2.00% | 2.00% | 612.82 | 2.71 | 246.44 | 0.00 | 963.00 | 175.09 | 175.09 |
| West Coast Sandstone 256D30028 | 10.26 | 1.00 | 195.00 | 14.00% | 0.02% | 0.00% | 0.00% | 7.00% | 0.00% | 3.00% | 1226.83 | 1.31 | 0.00 | 0.00 | 613.41 | 0.00 | 262.89 |
| West Coast Tan 2568D60013 | 10.61 | 1.00 | 195.00 | 13.00% | 0.01% | 0.00% | 3.00% | 7.00% | 0.00% | 3.00% | 1178.06 | 1.18 | 0.00 | 271.86 | 634.34 | 0.00 | 271.86 |
| R-547 Brass 2563T80021 | 8.60 | 1.00 | 195.00 | 12.00% | 0.02% | 0.00% | 0.00% | 2.00% | 2.00% | 2.00% | 881.43 | 1.69 | 0.00 | 0.00 | 146.91 | 146.91 | 146.91 |
| Fabwel Birch White 2569W10032 | 11.70 | 1.00 | 195.00 | 0.00% | 0.01% | 0.00% | 0.00% | 6.00% | 0.00% | 2.00% | 0.00 | 1.00 | 0.00 | 0.00 | 599.58 | 0.00 | 199.86 |
| | | | | | | | | Uncontrolled | | (tons/yr): | 1227 | 2.71 | 246 | 272 | 963 | 175 | 272 |
| | | | | | | | | Totals | | (lb/hr): | 280.1 | 0.620 | 56.3 | 62.1 | 219.9 | 40.0 | 62.1 |
| | | | | | | | | | | (g/sec): | 35.29 | 0.078 | 7.09 | 7.82 | 27.70 | 5.04 | 7.82 |
| | | | | | | | | Controlled | | (tons/yr): | 36.6 | 0.081 | 7.34 | 8.10 | 28.7 | 5.22 | 8.10 |
| | | | | | | | | Totals | | (lb/hr): | 8.35 | 0.018 | 1.677 | 1.850 | 6.552 | 1.191 | 1.850 |
| | | | | | | | | | | (a/sec): | 1 052 | 0.002 | 0.211 | 0.233 | 0.826 | 0.150 | 0.233 |

| Material | Density | HAP | 1998 | Scaling | Uncontolled | Uncontrolled | Uncontrolled | Control | Controlled | Controlled | Controlled |
|---------------------------|----------|---------|----------|---------|-------------|--------------|--------------|------------|------------|------------|------------|
| | (lb/gal) | Percent | Usage | Factor* | Potential | Potential | Potential | Efficiency | Potential | Potential | Potential |
| | | | (gal/yr) | | HAP pounds | HAP tons | HAP tons | | HAP tons | HAP lb/hr | HAP g/sec |
| | | | | | per hour | per day | per year | | per year | | |
| Paint Thinning Operation | | | | | | | | | | | |
| Line 1 | | | | | | | | | | | |
| 2 - butoxyethanol | 7.50 | 100% | 4200 | | 3.60 | 0.04 | 15.8 | 97.02% | 0.469 | 0.11 | 0.01 |
| Line 2 | | | | | | | | | | | |
| 2 - butoxyethanol | 7.50 | 100% | 4200 | 4.26 | 15.32 | 0.18 | 67.1 | 97.02% | 2.00 | 0.46 | 0.06 |
| Roller Cleaning Operation | | | | | | | | | | | |
| Line 1 | | | | | | | | | | | |
| toluene | 7.25 | 100% | 4121 | | 3.41 | 0.04 | 14.9 | 97.02% | 0.445 | 0.10 | 0.01 |
| Line 2 | | | | | | | | | | | |
| toluene | 7.25 | 100% | 4121 | 4.26 | 14.53 | 0.17 | 63.6 | 97.02% | 1.90 | 0.43 | 0.05 |
| TOTAL | | | | | 18.7 | 0.225 | 82.0 | | 2.44 | 0.558 | 0.070 |

| Material | Density (lb/gal) | 1998 Usage (gal/yr) | Scaling Factor* | Weight % MEK | Weight % 2-butoxy- ethanol | Control Efficiency | MEK Emissions (tons/yr) | 2-butoxy- ethanol (tons/yr) |
|--------------------------|---------------------|---------------------------|--------------------|-----------------|----------------------------------|-----------------------|-------------------------------|-----------------------------------|
| Coil Cleaning Operations | | | | | | | | |
| Alkaline Cleaner | 10.59 | 2580 | 4.26 | 0.00% | 3.00% | 0.00% | 0.00 | 1.75 |
| | | | | | | | | |
| Quality Control Testing | | | | | | | | |
| MEK | 6.72 | 300 | 4.26 | 100.00% | 0.00% | 0.00% | 4.29 | 0.00 |

Grand Totals Uncontrolled Emissions

| Xylene | Formaldehyde | Nickel | Chromium | Glycol Ethers | Naphthalene | Ethyl- | MEK | 2-butoxy- | Toluene |
|-----------|--------------|-----------|-----------|---------------|-------------|-----------|-----------|-----------|-----------|
| Emissions | Emissions | Compounds | Compound | Emissions | Emissions | benzene | Emissions | ethanol | (tons/yr) |
| (tons/yr) | (tons/yr) | Emissions | Emissions | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | |
| | | (tons/yr) | (tons/yr) | | | | | | |
| 1227 | 2.71 | 246 | 272 | 963 | 175 | 272 | 4.29 | 84.6 | 14.9 |

Grand Totals Controlled Emissions

| Xylene | Formaldehyde | Nickel | Chromium | Glycol Ethers | Naphthalene | Ethyl- | MEK | 2-butoxy- | Toluene |
|-----------|--------------|-----------|-----------|---------------|-------------|-----------|-----------|-----------|-----------|
| Emissions | Emissions | Compounds | Compound | Emissions | Emissions | benzene | Emissions | ethanol | (tons/yr) |
| (tons/yr) | (tons/yr) | Emissions | Emissions | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | |
| | | (tons/yr) | (tons/yr) | | | | | | |
| 36.6 | 0.081 | 7.34 | 8.10 | 28.7 | 5.22 | 8.10 | 4.29 | 4.21 | 2.34 |

Grand Total Uncontrolled 3262 (tons/yr): Controlled 105

Total State Potential Emissions

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Scaling Factor= The new line is has a capacity 3.25 times greater than the old line. The ratio of 1998 potentiall hours to actual hours is 1.31. Therefore, a scaling factor of 4.26 (3.25*1.31) was used to calculate the PTE.

Appendix A: State Potential Emissions Calculations VOC and Particulate

Company Name: Jupiter Aluminum Corporation, Jupiter Coilcoating Division

Address City IN Zip: 205 East Cary Street, Fairland, Indiana 46126

Part 70: 145-12499 Plt ID: 145-00013

Reviewer: Paula M. Cognitore

Date: July 19, 2000

| Material | Density | VOC | 1998 | Scaling | Potential | Potential | Potential |
|--------------------------|----------|----------|----------|---------|------------|-----------|-----------|
| | (lb/gal) | Content | Usage | Factor* | VOC pounds | VOC tons | VOC tons |
| | | (lb/gal) | (gal/yr) | | per hour | per day | per year |
| Coil Cleaning Operations | | | | | | | |
| Line 1 Alkaline Cleaner | 10.59 | 0.32 | 2580.00 | 1.31 | 0.12 | 0.00 | 0.541 |
| Line 2 Alkaline Cleaner | 10.59 | 0.32 | 2580.00 | 4.26 | 0.40 | 0.00 | 1.76 |
| Quality Control Testing | | | | | | | |
| MEK | 6.72 | 6.72 | 300.00 | 4.26 | 0.98 | 0.01 | 4.29 |
| TOTAL | | | | | 1.38 | 0.017 | 6.05 |

State Potential Emissions

METHODOLOGY

Scaling Factor= The new line is has a capacity 3.25 times greater than the old line. The ratio of 1998 potential hours to actual hours is 1.31. Therefore, a scaling factor of 4.26 (3.25*1.31) was used to calculate the PTE.

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal)*Gal of Material (gal/yr) *4.26*(1/8760)

Potential VOC Pounds per Day = (Pounds of VOC per hour*24 hours)/2000 lbs

Potential VOC Tons per Year = tons of VOC per day*365 days